

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIM. NO. 04-10293-JLT
	)	
MARK F. MARCHESE,(1)	)	
FRANK R. BOWMAN, JR.,(2)	)	
ANTHONY P. RAYMOND,(3)	)	
a/k/a Razor Ramone,	)	
a/k/a Tony Ramone,	)	
a/k/a Tony Ramond,	)	
Defendants.	)	
	)	

**JOINT INITIAL STATUS CONFERENCE MEMORANDUM**

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, and the defendant FRANK R. BOWMAN, JR., by and through his counsel, Charles A. Clifford, Esq., jointly submit this memorandum pursuant to the Initial Status Conference ordered by this Court on November 9, 2004. In so doing, the parties address herein the issues delineated in L.R. 116.5(A) pertaining to initial status conferences.

1. There is no need for relief from the otherwise applicable timing requirements imposed by L.R. 116.3.

2. The government has provided open file discovery to the defense counsel and will continue to provide open file discovery if and when further evidence becomes available to the government. Having provided open file discovery, the government does not anticipate providing any further discovery (other than that required to be produced at least twenty-one days prior to

trial pursuant to L.R. 116.2(B)(2)(a)-(g)), but allows that it might do so in response to specific defense requests.

3. The parties would request that the Court deem excludable twenty-four days commencing on November 9, 2004, the date of arraignment of this defendant on the original Superseding Indictment (the defendant neither having elected in writing to proceed under the automatic discovery process nor having filed a written waiver of automatic discovery).

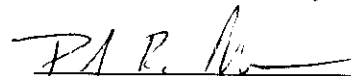
4. At this juncture, the parties anticipate resolution of this matter (with regard to this defendant) by a plea agreement.

5. The parties would respectfully request that this Court forward the matter (with regard to this defendant) to the District Court in order that a date may be set by the District Court on which the defendant may plead.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney


By:



Paul R. Moore  
Assistant United States Attorney

FRANK R. BOWMAN, JR.  
Defendant

By:



Charles A. Clifford, Esq.  
Counsel for Frank R. Bowman, Jr.

DATE: December 9, 2004